

# **Exhibit 41**

*Redacted Public Version*

1  
2 UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
3 Case No. 1:22-cv-00983-VEC

-----x

4 NIKE, INC.,

5 Plaintiff,

6 - against -

7 STOCKX LLC,

8 Defendant.

9 -----x

10 February 8, 2023

9:48 a.m.

11  
12  
13 VIDEOTAPED DEPOSITION of JOE PALLETT,  
14 located at Debevoise & Plimpton LLC, 66  
15 Hudson Boulevard, New York, New York 10001,  
16 before Anthony Giarro, a Registered  
17 Professional Reporter, a Certified Realtime  
18 Reporter and a Notary Public of the State  
19 of New York.  
20  
21  
22  
23  
24  
25

<p style="text-align: right;">Page 2</p> <p>1 2 A P P E A R A N C E S : 3 4 5 DLA PIPER LLP Attorneys for Plaintiff 6 1251 Avenue of the Americas New York, New York 10020 7 212.335.4964 8 BY: TAMAR DUVDEVANI, ESQ. MARC MILLER, ESQ. 9 tamar.duvdevani@dlapiper.com marc.miller@dlapiper.com 10 11 DEBEVOISE &amp; PLIMPTON LLP Attorneys for Defendant 12 919 Third Avenue New York, New York 10022 13 BY: MEGAN K. BANNIGAN, ESQ. MAI-LEE PICARD, ESQ. 14 mkbannigan@debevoise.com mpicard@debevoise.com 15 16 DEBEVOISE &amp; PLIMPTON LLP Attorneys for Defendant 17 650 California Street San Francisco, California 94108 18 BY: CHRISTOPHER FORD, ESQ. csford@debevoise.com 19 20 ALSO PRESENT: 21 ANTON EVANGELISTA, Videographer 22 KIMBERLY VAN VOORHIS, ESQ., Nike 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 2 THE VIDEOGRAPHER: Good 3 morning. We are going on the record 4 at 9:48 a.m. on February 8th, 2023. 5 Please note that the microphones are 6 sensitive and may pick up whispering 7 and private conversations. Please 8 mute your phones at this time. Audio 9 and video recording will continue to 10 take place unless all parties agree 11 to go off the record. 12 This is Media Unit 1 of the 13 video-recorded deposition of Joe 14 Pallett, taken by counsel for 15 plaintiff, in the matter of Nike 16 Incorporated versus StockX LLC, filed 17 in the United States District Court 18 for the Southern District of New 19 York, Case No. 1:22-cv-00983-VEC. 20 The location of the deposition is 21 Debevoise &amp; Plimpton, 66 Hudson 22 Boulevard in New York City. 23 My name is Anton Evangelista 24 representing Veritext. And I am the 25 videographer. The court reporter is</p>
<p style="text-align: right;">Page 3</p> <p>1 2 S T I P U L A T I O N S 3 4 IT IS HEREBY STIPULATED AND AGREED, 5 by and among counsel for the respective 6 parties hereto, that the filing, sealing 7 and certification of the within deposition 8 shall be and the same are hereby waived; 9 IT IS FURTHER STIPULATED AND AGREED 10 that all objections, except as to form of 11 the question, shall be reserved to the time 12 of the trial; 13 IT IS FURTHER STIPULATED AND AGREED 14 that the within deposition may be signed 15 before any Notary Public with the same 16 force and effect as if signed and sworn to 17 before the Court. 18 * * * 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 2 Anthony Giarro from the firm 3 Veritext. 4 I'm not authorized to 5 administer an oath, I'm not related 6 to any party in this action, nor am I 7 financially interested in the 8 outcome. 9 If there are any objections 10 to the proceeding, please state them 11 at the time of your appearance. 12 Counsel and all present will 13 now state their appearances and 14 affiliations for the record, 15 beginning with the noticing attorney. 16 MS. BANNIGAN: Thank you. 17 Good morning. I'm Megan Bannigan of 18 Debevoise &amp; Plimpton on behalf of 19 StockX. And with me are my 20 colleagues from Debevoise &amp; Plimpton, 21 Mai-Lee Picard and Christopher Ford. 22 MS. DUVDEVANI: Good 23 morning. Tamar Duvdevani, DLA Piper, 24 on behalf of Nike, Inc. With me is 25 my colleague, Marc Miller, also with</p>

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1                   JOE PALLETT

2     DLA Piper, and Kim Van Voorhis of

3     Nike Air.

4             And just to correct the

5     videographer's colloquy, it was

6     defendant that noticed the deposition

7     today, not plaintiff.

8             THE VIDEOGRAPHER: And will

9     the court reporter please swear in

10    the witness. And counsel may

11    proceed.

12    J O E P A L L E T T, after having first

13    been duly sworn by a Notary Public of the

14    State of New York, was examined and

15    testified as follows:

16    EXAMINATION BY

17    MS. BANNIGAN:

18     Q     Good morning. There appears

19     to be some buzzing. But hopefully, that

20     is short-lived.

21     [REDACTED]

22     [REDACTED]

23     [REDACTED]

24     Q     So I'm sure you've gone over

25     this already. But just a few ground

Page 7

1                   JOE PALLETT

2     rules we like to start with at the

3     beginning, your testimony is under oath

4     today. Because there is a court reporter

5     taking down everything that both of us

6     are saying and it may be used for trial

7     purposes or for other reasons in the case

8     going forward, let's just do a few things

9     to make sure everything is clear.

10    A     Sure.

11    Q     First, I will try not to

12    interrupt you. If you could let me

13    finish my questions, that would be great.

14    If you don't understand anything, please

15    let me know, and I'll try to clarify so

16    we could make sure the record is very

17    clear.

18             If you want to take a break

19    at any time, I ask that you just finish

20    the question, or we might have one or two

21    more questions to finish the topic that

22    we're talking about. But feel free to

23    let me know whenever you want to take a

24    break, and I'm happy to accommodate.

25    A     Great.

Page 8

1                   JOE PALLETT

2     Q     And other than that, it's

3     pretty basic.

4             So the other thing I'll say

5     is please just make sure to give a spoken

6     answer instead of nodding or saying

7     mm-hmm so the court reporter can do his

8     job.

9     A     Got it.

10    Q     Any questions before we

11    begin?

12    A     No.

13    Q     Okay. Great.

14    [REDACTED]

15    [REDACTED]

16    [REDACTED]

17    [REDACTED]

18    [REDACTED]

19    [REDACTED]

20    [REDACTED]

21    [REDACTED]

22    [REDACTED]

23    [REDACTED]

24    [REDACTED]

25    [REDACTED]

Page 9

1                   JOE PALLETT

2    [REDACTED]

3    [REDACTED]

4    [REDACTED]

5    [REDACTED]

6    [REDACTED]

7    [REDACTED]

8    [REDACTED]

9    [REDACTED]

10   [REDACTED]

11   [REDACTED]

12   [REDACTED]

13   [REDACTED]

14   [REDACTED]

15   [REDACTED]

16   [REDACTED]

17   [REDACTED]

18   [REDACTED]

19   [REDACTED]

20   [REDACTED]

21   [REDACTED]

22   [REDACTED]

23   [REDACTED]

24   [REDACTED]

25   [REDACTED]

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1 JOE PALLETT

2 A Two years.

3 Q Until about 2015?

4 A Yeah.

5 Q And then what did you do

6 from there?

7 A Following a series of

8 stretch assignments, I joined the brand

9 protection team.

10 Q What do you mean by a series

11 of stretch assignments?

12 A Stretch assignments are

13 something that exist at Nike that allow

14 employees to spend a certain amount of

15 their workweek working outside of their

16 primary job to explore other options

17 within the company.

18 Q So did you do stretch

19 assignments within brand protection?

20 A Yes.

21 Q And that led to being hired

22 full-time by brand protection?

23 A Yes.

24 Q Do you recall when you

25 started working full-time for brand

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1 JOE PALLETT

2 protection?

3 A 2015.

4 Q What was your position when

5 you first started in brand protection?

6 A Initially operations and

7 reporting manager.

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q How long did you hold that

18 role for?

19 A I think about two years.

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 Q So what were your primary

Page 40

1 JOE PALLETT

2 responsibilities?

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 JOE PALLETT

2 Q And so did you become a

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Page 42

1 JOE PALLETT  
2 Q With the responsibilities  
3 you just described?  
4 A Yes.  
5 Q How long were you in that  
6 role for?  
7 A I think about three years.  
8 Q So we're up to like 2019  
9 now? Does that sound about right?  
10 A 2018, yeah.  
11 Q So how did your job change  
12 in 2018?  
13 A When I became the brand  
14 protection manager?  
15 Q I don't know. I'm lost.  
16 I'm lost on the timeline now.  
17 A I am a little bit too. So  
18 I'll have to go back and confirm the  
19 years exactly.  
20 Q That's fine.  
21 A But when I became the brand  
22 protection manager, I was in that role  
23 for two to three years.  
24 Q Okay.  
25 And then what?

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1 JOE PALLETT  
2 [REDACTED]  
3 Q You said your title changed.  
4 What is your title today?  
5 A Director of authentication  
6 and innovation.  
7 Q And how has your role  
8 changed?  
9 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]

[illegible]

Page 45

1 JOE PALLETT  
2 [REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
8 Q And when did you start this  
9 most recent position or have this title  
10 change? It's like a memory test here. I  
11 know.  
12 A Yeah. I think my title has  
13 changed -- I think it was 2021 when it  
14 changed.  
15 Q And then do you recall when  
16 you became the director of connected  
17 product?  
18 A Yes.  
19 Q When was that?  
20 A That was like 2019; 2018 or  
21 2019, yeah.  
22 [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

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1 JOE PALLETT  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 Q When you say you can't  
7 recall the specifics, that's what's  
8 throwing me off a little bit.  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

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1 JOE PALLETT  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

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1 JOE PALLETT  
2 Q [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 A Sure.  
12 MS. DUVDEVANI: Objection.  
13 Go ahead [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

Page 93

1 JOE PALLETT  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

[illegible][illegible]

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1 JOE PALLETT  
2 [REDACTED]  
3 [REDACTED] [REDACTED]  
4 Q So when Mary Ange went to  
5 inspect the shoes, what did she do to  
6 ins [REDACTED]  
7 [REDACTED] [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 Q Did she do anything else?  
13 A I don't know for sure. But  
14 I don't believe so.  
15 Q And what did she find?  
16 A She found that three of the  
17 pairs of shoes that were suspicious of  
18 being counterfeit were, in fact,  
19 counterfeit.  
20 Q And so what did brand  
21 protection do next with respect to those  
22 counterfeit -- alleged counterfeit shoes?  
23 MS. DUVDEVANI: Objection.  
24 A Mary Ange took the product,  
25 put them in a shipping box and sent them

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1 JOE PALLETT  
2 to me.  
3 Q What did you do with them  
4 once you received them?  
5 MS. DUVDEVANI: Objection.  
6 A I inspected them myself and  
7 then stored them in the brand protection  
8 evidence locker.  
9 Q How did you inspect them?  
10 [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
13 Q Did you do anything else?  
14 A No.  
15 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



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1 JOE PALLETT

2 MS. DUVDEVANI: If you're

3 about to state -- I'm going to direct

4 you not to make any statements about

5 what you discussed with counsel for

6 Nike.

7 THE WITNESS: Okay.

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 MS. DUVDEVANI: I'm going to

16 object and instruct the witness not

17 to answer on the basis of

18 attorney-client privilege.

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 JOE PALLETT

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 Q And what did you learn at

8 that meeting?

9 MS. DUVDEVANI: Again, just

10 fact.

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Page 280

1 JOE PALLETT

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Page 281

1 JOE PALLETT

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 Then what did you do with

14 the shoes?

15 A Locked them in the evidence

16 locker.

17 Q Have you looked at them

18 since?

19 A They were removed from the

20 evidence locker, so that we could take

21 photographs of them.

22 Q Anything else?

23 A No.

24 MS. BANNIGAN: We're going

25 to mark as Exhibit 13, a document







Page 306

1                   JOE PALLETT  
 2                   [REDACTED]  
 3                   [REDACTED]  
 4                   [REDACTED]  
 5                   [REDACTED]  
 6                   [REDACTED]  
 7           MS. DUVDEVANI: Objection.  
 8       A     I'm sorry. Could you try  
 9     that one again?  
 10    Q     Sure.  
 11           So other than this  
 12     investigation that we're talking about --  
 13     withdrawn that.  
 14           [REDACTED]  
 15           [REDACTED]  
 16           [REDACTED]  
 17           [REDACTED]  
 18           [REDACTED]  
 19           [REDACTED]  
 20           [REDACTED]  
 21    Q     I believe that you're  
 22     familiar with Roy Kim?  
 23    A     Yes.  
 24    Q     Who is Roy Kim?  
 25    A     Roy Kim is a shoe collector

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1                   JOE PALLETT  
 2     and trader from San Diego.  
 3           [REDACTED]  
 4           [REDACTED]  
 5           [REDACTED]  
 6    Q     You said that Mr. Kim is a  
 7     shoe collector and trader from San Diego.  
 8           What do you mean by that?  
 9    A     He collects shoes.  
 10   Q     Do you know anything else  
 11     about his background with respect to  
 12     collecting shoes?  
 13   A     No.  
 14   Q     Did you ask him anything  
 15     about his shoe collection?  
 16   A     No.  
 17   Q     Did you ever meet Mr. Kim?  
 18   A     Briefly, yes.  
 19   Q     And what were the  
 20     circumstances in which you met Mr. Kim?  
 21   A     He invited us to his house  
 22     to inspect a product that he was  
 23     suspicious was counterfeit.  
 24   Q     Did you go to his house?  
 25   A     Yes.

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1                   JOE PALLETT  
 2                   [REDACTED]  
 3                   [REDACTED]  
 4                   [REDACTED]  
 5                   [REDACTED]  
 6                   [REDACTED]  
 7                   [REDACTED]  
 8                   [REDACTED]  
 9                   [REDACTED]  
 10                  [REDACTED]  
 11                  [REDACTED]  
 12                  [REDACTED]  
 13                  [REDACTED]  
 14                  [REDACTED]  
 15                  [REDACTED]  
 16                  [REDACTED]  
 17                  [REDACTED]  
 18                  [REDACTED]  
 19                  [REDACTED]  
 20                  [REDACTED]  
 21                  [REDACTED]  
 22                  [REDACTED]  
 23                  [REDACTED]  
 24                  [REDACTED]  
 25                  [REDACTED]

Page 309

1                   JOE PALLETT  
 2                   [REDACTED]  
 3                   [REDACTED]  
 4                   [REDACTED]  
 5                   [REDACTED]  
 6                   [REDACTED]  
 7                   [REDACTED]  
 8                   [REDACTED]  
 9                   [REDACTED]  
 10                  [REDACTED]  
 11                  [REDACTED]  
 12                  [REDACTED]  
 13                  [REDACTED]  
 14                  [REDACTED]  
 15                  [REDACTED]  
 16                  [REDACTED]  
 17                  [REDACTED]  
 18                  [REDACTED]  
 19                  [REDACTED]  
 20                  [REDACTED]  
 21                  [REDACTED]  
 22                  [REDACTED]  
 23                  [REDACTED]  
 24                  [REDACTED]  
 25                  [REDACTED]



<p style="text-align: right;">Page 314</p> <p>1                   JOE PALLETT</p> <p>2                   [REDACTED]</p> <p>3                   [REDACTED]</p> <p>4                   [REDACTED]</p> <p>5                   [REDACTED]</p> <p>6                   [REDACTED]</p> <p>7           Q     Did anyone go with you to</p> <p>8     Roy Kim's house?</p> <p>9           A     Yes.</p> <p>10          Q     Who?</p> <p>11          A     An attorney named Melissa.</p> <p>12          Q     Melissa who?</p> <p>13          A     I don't remember her last</p> <p>14     name.</p> <p>15          Q     She was an attorney from</p> <p>16     Nike?</p> <p>17          A     No.</p> <p>18                MS. DUVDEVANI: Melissa</p> <p>19     Reinckens.</p> <p>20                MS. BANNIGAN: From DLA?</p> <p>21                MS. DUVDEVANI: Correct.</p> <p>22          Q     And what did Melissa do</p> <p>23     while you were there?</p> <p>24          A     She sat by the shoes and let</p> <p>25     me do my work.</p>	<p style="text-align: right;">Page 316</p> <p>1                   JOE PALLETT</p> <p>2     going today?</p> <p>3                MS. BANNIGAN: I think we</p> <p>4     have less than an hour left. So less</p> <p>5     than an hour.</p> <p>6                MS. DUVDEVANI: Okay.</p> <p>7          Q     This is a chart with the</p> <p>8     beginning Bates Stamp NIKE0029087. Given</p> <p>9     the size we printed it, you can't see the</p> <p>10    Bates Stamp on the document. But that</p> <p>11    was the Bates Stamp it was produced with</p> <p>12    by Nike.</p> <p>13                You recognize this chart?</p> <p>14          A     Yes.</p> <p>15          Q     Did you make it?</p> <p>16          A     Yes.</p> <p>17          Q     When did you make it?</p> <p>18          A     After visiting Roy Kim.</p> <p>19          Q     Why did you make this chart?</p> <p>20          A     To document the findings</p> <p>21    that I made after inspecting Roy Kim's</p> <p>22    shoes.</p> <p>23          Q     And does this chart</p> <p>24    accurately reflect your findings?</p> <p>25          A     Yes.</p>
<p style="text-align: right;">Page 315</p> <p>1                   JOE PALLETT</p> <p>2          Q     Did she inspect the shoes at</p> <p>3     all?</p> <p>4          A     No.</p> <p>5          Q     Were any of the shoes in</p> <p>6     Mr. Kim's possession missing a StockX tag</p> <p>7     or a receipt?</p> <p>8          A     Yes.</p> <p>9          Q     And were you able to</p> <p>10    conclude -- in that scenario, how was</p> <p>11    Nike able to conclude that the shoes were</p> <p>12    sold by StockX?</p> <p>13          A     I don't know.</p> <p>14                MS. DUVDEVANI: Objection.</p> <p>15          Q     Is Nike able to conclude</p> <p>16    that those shoes were sold by StockX?</p> <p>17                MS. DUVDEVANI: Objection.</p> <p>18          A     I don't know.</p> <p>19                MS. BANNIGAN: We're going</p> <p>20    to mark this as Exhibit 15.</p> <p>21                (The above-referred-to</p> <p>22    document was marked as Exhibit 15 for</p> <p>23    identification, as of this date.)</p> <p>24                MS. DUVDEVANI: Any idea</p> <p>25    approximately how much longer we're</p>	<p style="text-align: right;">Page 317</p> <p>1                   JOE PALLETT</p> <p>2          Q     And did you take all of</p> <p>3     these photos that are on the chart?</p> <p>4          A     I did.</p> <p>5          Q     Did anybody insist you --</p> <p>6     assist you in any way in collecting the</p> <p>7     information from this chart?</p> <p>8          A     No.</p> <p>9          Q     Or creating the chart?</p> <p>10          A     No.</p> <p>11          Q     Are you familiar with the</p> <p>12    term backdoor sales?</p> <p>13          A     Yes.</p> <p>14          Q     What does the term mean?</p> <p>15          A     Backdoor sales refer to gray</p> <p>16    market trade where authorized Nike</p> <p>17    accounts, instead of selling product</p> <p>18    through the authorized channels, that we</p> <p>19    want them to remove product from their</p> <p>20    inventory and sell it elsewhere.</p> <p>21          Q     Is Nike concerned with</p> <p>22    factories that make Nike shoes, turning</p> <p>23    around and making and selling</p> <p>24    unauthorized versions of Nike shoes?</p> <p>25                MS. DUVDEVANI: Objection.</p>

80 (Pages 314 - 317)

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1  
2 CERTIFICATION  
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4

5 I, ANTHONY GIARRO, a Shorthand  
6 Reporter and a Notary Public, do hereby  
7 certify that the foregoing witness, JOE  
8 PALLETT, was duly sworn on the date  
9 indicated, and that the foregoing, to the  
10 best of my ability, is a true and accurate  
11 transcription of my stenographic notes.

12 I further certify that I am not  
13 employed ~~by nor related to any party to~~  
14 this action

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18 \_\_\_\_\_  
19 ANTHONY GIARRO  
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2 ERRATA SHEET  
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6 Mineola, New York 11501 New York, New  
7 York 10036

8 NAME OF CASE: Nike versus StockX  
9 DATE OF DEPOSITION: February 8, 2023  
10 NAME OF DEPONENT: Joe Pallett

11 PAGE LINE (S) CHANGE REASON  
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26 \_\_\_\_\_  
27 JOE PALLETT

28 SUBSCRIBED AND SWORN TO BEFORE ME  
29 THIS \_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_.

30 \_\_\_\_\_  
31 (NOTARY PUBLIC) MY COMMISSION EXPIRES:

90 (Pages 354 - 355)